

**FILED**

**MAR 22 2013**

**Board of Vocational Nursing  
and Psychiatric Technicians**

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**BEFORE THE  
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. PT-2010-4404

**KATHY DUARTE**  
**29002 Jasmine Creek Lane**  
**Highland, CA 92346**

**A C C U S A T I O N**

**Psychiatric Technician License No. PT  
31006**

Respondent.

Complainant alleges:

**PARTIES**

1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians, Department of Consumer Affairs.

2. On or about August 7, 2001, the Board of Vocational Nursing and Psychiatric Technicians issued Psychiatric Technician License Number PT 31006 to Kathy Duarte (Respondent). The Psychiatric Technician License was in full force and effect at all times relevant to the charges brought herein and will expire on April 30, 2013, unless renewed.

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1 fraudulently claiming, receiving and accepting wages from the state for hours that she had not  
2 actually worked.

3 b. Specifically, Respondent conspired with Romero to submit false information to the  
4 State Controller's Office which indicated that Respondent was working a full-time schedule and  
5 exorbitant amounts of overtime at PSH when, in fact, Respondent worked few regular hours each  
6 month and little to no overtime. As a result of these fraudulent activities, Respondent was  
7 routinely issued paychecks which grossly overstated the amount owed to her by the state.  
8 Respondent deposited each of those checks into her bank account, later withdrawing substantial  
9 portions of the stolen income to share with Romero. Romero admitted his involvement in the  
10 conspiracy with Respondent when questioned by officers of the Patton State Hospital Police  
11 Department.

12 **PRAYER**

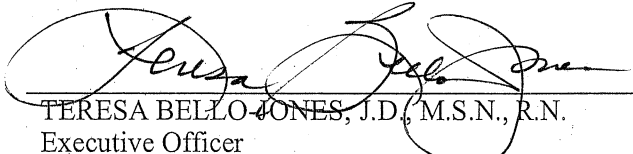
13 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
14 and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians  
15 issue a decision:

16 1. Revoking or suspending Psychiatric Technician License Number PT 31006, issued to  
17 Kathy Duarte;

18 2. Ordering Kathy Duarte to pay the Board of Vocational Nursing and Psychiatric  
19 Technicians the reasonable costs of the investigation and enforcement of this case, pursuant to  
20 Business and Professions Code section 125.3;

21 3. Taking such other and further action as deemed necessary and proper.

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23 DATED: **MAR 22 2013**

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25 TERESA BELLO-JONES, J.D., M.S.N., R.N.  
26 Executive Officer  
27 Board of Vocational Nursing and Psychiatric Technicians  
28 Department of Consumer Affairs  
State of California  
Complainant

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